

April 9, 2020

Mr. Matt Holmes  
Manager of Planning Services  
Town of Bracebridge  
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Bracebridge, ON  
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Dear Mr. Holmes:

**Re: Final Peer Review of Addendum Number 2 - Environmental Impact Study for Muskoka Royale College**

We have completed our final peer review of environmental reports submitted to the Town of Bracebridge as part of Official Plan and Zoning Amendment applications by Muskoka Royale Development Inc. The proposed development of the Muskoka Royale College would occur on property located between Stephens Bay Road and Stagecoach Road to the east and Ecclestone Drive to the west (legally described as Lots 7 and 8 and part of Lots 6, 9 and 10, concession 12, Muskoka North Ward, Town of Bracebridge, District Municipality of Muskoka).

## **Background**

Our peer review was conducted through a review of environmental reports and addenda, additional background material, relevant policy and legislation, and a site visit to the subject lands with Gord Nielsen (Michalski Nielsen Associates Ltd. [MNAL]) on May 7, 2019. We also had several meetings with the Town of Bracebridge and the proponents' representatives to discuss our concerns, as detailed below.

We reviewed the following documents to support the Town of Bracebridge's analysis of the amendment applications:

- ❁ MNAL (2018) EIS Muskoka Royale College,
- ❁ MNAL (2019) Addendum #1: Clarifications and Supplementary Technical Information on our EIS for Muskoka Royale College
- ❁ MNAL (2020) Addendum #2: Responding to the July 14 [sic], 2019 Peer Review Comments
- ❁ MNAL (2018) Species at Risk (SAR) Assessment Muskoka Royale College,
- ❁ Pinestone Engineering Ltd. (2018) Muskoka Royale Campus Preliminary Servicing Report (with respect to the ecological implications of proposed stormwater management),
- ❁ Snyder Architects 2018 Site Concept,
- ❁ Ministry of Natural Resources and Forestry (MNRF) correspondence re: SAR review, dated March 19, 2019,

- ❖ Additional background material provided to us by the Town of Bracebridge (Town of Bracebridge Staff Report PD024-19 dated April 3, 2019; Public Works Department Memorandum dated March 5, 2019, re: Official Plan and Zoning Amendment Applications D09-08/18 and D14-17/18, Muskoka Royale Campus; District Municipality of Muskoka 2005 Bracebridge West Transportation Corridor Class Environmental Assessment. Environmental Study Report),
- ❖ Additional background material provided to us by MNAL (Supplementary Information on the Plans for Muskoka Royale College),
- ❖ Town of Bracebridge Official Plan (2013) and Comprehensive Zoning By-Law (2016),
- ❖ District Municipality of Muskoka Official Plan (2014),
- ❖ AECOM (2011) District Municipality of Muskoka - Muskoka Official Plan Review Background Study: Urban Centres Natural Heritage Review,
- ❖ Bird Studies Canada et al. (2006) Ontario Breeding Bird Atlas,
- ❖ MNRF's Natural Heritage Information Centre records of SAR and natural areas, MNRF (2014) Significant Wildlife Habitat Mitigation Support Tool and (2015) Significant Wildlife Habitat Criteria Schedules for Ecoregion 5E, MNRF (2017) Survey Protocol for SAR Bats within Treed Habitats, and
- ❖ Provincial and federal policy and legislation (Ontario: 2014 Provincial Policy Statement, *Endangered Species Act*; federal: *Fisheries Act*, *Species at Risk Act*).

On May 13, 2019, Hutchinson Environmental Sciences Ltd. (HESL) submitted a draft peer review of the proposed Muskoka Royale Development to the Town of Bracebridge. Our peer review focused on determining whether the environmental reports

- ❖ contain sufficient information on the natural environment of the area (including detailed documentation of natural features, ecological functions, and natural and human-made hazards, environmental sensitivities and constraints, and potential impacts of the proposed development on these features, functions, and hazards);
- ❖ use the correct methodologies to gather the information (e.g., that follow industry standards and apply appropriate scientific approaches); and
- ❖ make sound conclusions and recommendations, based on the best available information, so that the development proposal avoids negative impacts on significant natural heritage features and their ecological functions and conforms with applicable environmental policies and legislation.

Following submission of our draft peer review, we met with the proponent's representatives (MNAL, Palmer Environmental Consulting Group, and the Jones Consulting Group), the Town of Bracebridge and the District Municipality of Muskoka on May 17, 2019 to discuss the draft peer review and outline future steps in the review and permitting process. At the meeting,

- ❖ Staff from the District of Muskoka informed the peer review team that, because only the provincial ministry with jurisdiction can delineate specific SAR habitat and provide recommendations to prevent harm or destruction, the portion of the EIS respecting SAR habitat should only be assessed by the MNRF. We were therefore directed by the Town of Bracebridge to change the scope of our review to exclude SAR issues and our associated comments, as MNRF had already conducted a SAR review of the EIS in March 2019. Reference to SAR from our original May 13, 2019 report was therefore removed from our subsequent review.
- ❖ MNAL presented several items of clarification.



- ❖ MNAL provided additional information and commitments, which were subsequently presented in Addendum #1 on May 28, 2019.

We reviewed Addendum #1 and submitted an updated peer review to the Town on July 4, 2019. On July 23, 2019 we met with the proponent's representatives (MNAL and Palmer Environmental Consulting Group) to discuss our updated comments and their response. We met again with the Town and the proponent's representatives (MNAL and the Jones Consulting Group) on December 10, 2019, at which time MNAL informed us that their response would be presented in a second addendum. The draft Addendum #2 was submitted to the Town on February 6, 2020. We met with the Town and the proponent's representatives (MNAL, Palmer Environmental Consulting Group and the Jones Consulting Group) on February 25, 2020 to discuss the draft Addendum #2. MNAL subsequently released their final Addendum #2 on March 10, 2020.

## Final Peer Review

We present our final peer review comments in the attached disposition table. Of our original 32 recommendations, eight were resolved in Addendum #1. Of the remaining 24 recommendations, 20 are fully resolved in Addendum #2 and four are conditionally resolved for the following reasons:

- ❖ Recommendation #1 – We support the additional protective measure afforded by the Town's institutional zoning, which will require a maximum 50% lot coverage and a minimum 30% landscaped area for each precinct. We recommend that the minimum 30% landscaped area be left in a natural state as much as possible (i.e., undisturbed with existing or replanted native vegetation).
- ❖ Recommendation #3 – We support the Town's decision to apply a holding provision to each precinct, requiring acceptance of a site-specific EIS as a condition for its removal. Each site-specific EIS should include justification for any buffers less than 30 m around wetlands and watercourses. If a variable buffer approach is used as part of the justification, the site-specific EIS must demonstrate how it will ensure a minimum average buffer of 30 m around every wetland and watercourse and explain how the ecological functions of the wetlands and watercourses will be retained. Addendum #2 includes multiple references to buffering “well-defined watercourses” instead of just “watercourses”. The term “well-defined” can be ambiguous and we prefer the term “watercourse” or specific reference to “ephemeral”, “intermittent” or “permanent’ watercourses (following Irwin et al. 2013<sup>1</sup>).
- ❖ Recommendation #4 – In general we support MNAL's approach to buffers as described in Appendix A, providing it applies to both wetlands and watercourses (as discussed under Recommendation #3). As such, any buffers less than 30 m (but still greater than 15 m) around wetlands (and watercourses as discussed under #3) will be addressed in site-specific EISs during the site plan control stage and will include the following components that will be subject to municipal review and potential buffer adjustments:
  - 1) Rationalization on why a 30 m buffer cannot be achieved,

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<sup>1</sup> Irwin, K., B. Bergmann, and J. Boos. 2013. *The Stream Permanency Handbook for South-central Ontario. Second Edition.* Ontario Ministry of Natural Resources, 30 pp.



- 2) A demonstration that a minimum average 30 m buffer is still being provided around that specific wetland and watercourse as a whole, as part of a variable width buffer approach, and
  - 3) Discussion on how ecological functions of the wetland and watercourse will be retained with the final buffer dimension that is being provided.
- ❁ Recommendation #23 – Based on the corrected calculations, the estimated snag densities for Precincts A-D are an order of magnitude higher than originally calculated (i.e., 13.5-25.7 snags/ha vs. 1.3-3.8 snags/ha). Following MNRF guidance (i.e., 10 snags/ha represents high quality potential maternity roosting habitat), all of these precincts should therefore be considered high quality habitat. These increased snag densities should be incorporated into the calculation of the number of bat boxes required per precinct.

## Overall Peer Review Assessment

It is apparent that the overall layout of the proposed development, in five separate precincts, has been designed with the goal of protecting the natural landscape of the property as much as possible. Several sensitive environmental features have been addressed as primary (wetlands and watercourses) or secondary (rock barrens, drainage features, very steep slopes, deer wintering habitat) constraints in the proposed site plan, and buffers have been applied to reduce negative impacts. The development footprint seems relatively modest compared with many development projects within Bracebridge's urban boundary, and numerous recommendations are made within the EIS and addenda to preserve the remaining natural environment on the subject lands. Most of these recommended mitigation measures are to be applied and/or finalized during the site plan control stage for each precinct. We thus emphasize the importance of continued assessment of the environmental impacts of the development as it progresses, combined with ongoing evaluation of the application and effectiveness of all mitigation measures planned for the project. We support the Town's decision to use holding provisions as a tool to ensure each precinct's development meets environmental protection conditions established in the EIS and addenda.

## Evaluation of Review Objectives

Our peer review focused on determining whether the EIS and its addenda met the following three criteria:

1. Does the EIS contain sufficient information on the natural environment of the area (including detailed documentation of natural features, ecological functions, and natural and human-made hazards, environmental sensitivities and constraints, and potential impacts of the proposed development on these features, functions, and hazards)?
2. Does the EIS use correct methodologies to gather the information (e.g., that follow industry standards and apply appropriate scientific approaches)?
3. Does the EIS make sound conclusions and recommendations, based on the best available information, so that the development proposal avoids negative impacts on significant natural heritage features and their ecological functions and conforms with applicable environmental policies and legislation?



We believe that the EIS and its addenda will meet these criteria if our additional comments in the attached disposition table are followed and MNAL's recommendations are implemented as proposed.

## Closing

Please feel free to contact us if you have any questions or concerns regarding this peer review.

Sincerely,  
per. Hutchinson Environmental Sciences Ltd.



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**Table 1. Peer Review Response.**

HESL Peer Review Recommendation #	Updated Recommendation From HESL	MNAL Response	Additional Comments from HESL
1	Please clarify what the maximum cleared area around all development within precincts would be at full build-out and provide this % footprint.	<p>This development will be phased over many years. The maximum cleared area around buildings and other facilities will be determined at the detailed design stage for each phase of development as part of the Site Plan Control process. However, it will generally average no more than 10 m. The updated recommendations in <b>Appendix A</b> include that there be an EIS prepared for each phase of the development, to be submitted as part of the Site Plan Control process. The municipality is required to approve Site Plans before any works can proceed.</p> <p>The Site Plan Control process, and associated completion of an EIS for each such application, provides an opportunity to confirm that the total extent of clearing for each area of development, as well as on full build-out of this property, is kept to a minimum. A majority of the property will remain undisturbed over the long term. The cumulative extent of development, including all associated clearing and site disturbance, will be included with each Site Plan Control application. The EIS has demonstrated that development at the scale that is proposed on this property can be accommodated with no negative impacts. We appreciate the acknowledgment in Section 3.0 of the peer review that this development footprint is relatively modest.</p>	We support the additional protective measure afforded by the Town’s institutional zoning, which will require a maximum 50% lot coverage and a minimum 30% landscaped area for each precinct. We recommend that the minimum 30% landscaped area be left in a natural state as much as possible (i.e., undisturbed and with existing or replanted native vegetation).
2	Original comment related to request for additional details on intended civil works within each development precinct, with response having been that this was a Site Plan detail. Resolved.	No further response required.	
3	Please clarify whether effects are calculated from the edge of each precinct or from the edge of the development footprint.	This development will be phased over many years, with the exact limits of development (beyond being restricted to the identified precincts and roadways) not having been finalized. A site-specific EIS will be submitted in support of each Site Plan Control application as part of this staged development process. As part of that exercise, impacts will be determined from the edge of the final development footprint, which is to be calculated as the clearing limit. The clearing limits will specifically consider the provision of buffers to wetlands and watercourses, which are targeted to be 30 m wherever feasible, and with a variable buffer approach to ensure a minimum average buffer of 30 m around every wetland.	<p>We support the Town’s decision to apply a holding provision to each precinct, requiring acceptance of a site-specific EIS as a condition for its removal. Each site-specific EIS will include justification for any buffers less than 30 m around wetlands and watercourses. If a variable buffer approach is used as part of the justification, the site-specific EIS will demonstrate how it will ensure a minimum average buffer of 30 m around every wetland and watercourse and explain how the ecological functions of the wetlands and watercourses will be retained.</p> <p>Addendum #2 includes multiple references to buffering “well-defined watercourses” instead of just “watercourses”. The term “well-defined” can be ambiguous and we prefer the term “watercourse” or specific references to “ephemeral”, “intermittent” or “permanent” watercourses, following The Stream Permanency Handbook for South-Central Ontario (Irwin et al. 2013).</p>
4	We recommend a minimum 30 m buffer around all wetlands and watercourses. If the 15 m buffer width is to be applied, we reiterate the need to provide ecological justification as per our original recommendation.	Further justification of the opportunity to use buffer averaging, with a minimum 30 m buffer adjacent to Henry Marsh and an average buffer of minimum 30 m, but with possible area-specific reductions to a minimum 15 m adjacent to other wetlands and warmwater watercourses, is provided in <b>Appendix B</b> . New mapping in that appendix demonstrates that very large buffers, much broader than 30 m, will be applied in a majority of circumstances. Exact limits of buffers will be determined and justified through the detailed design stage and Site Plan Control process. Per the recommendations included in <b>Appendix A</b> , a minimum 30 m buffer will be provided wherever that is feasible. However, there may be some instances where this cannot be achieved; in such instances, any reduction in buffer width to less than 30 m will be justified through the site-specific EIS which is to be completed in support of that Site Plan Control application. Further, and as included in the consolidated recommendations in <b>Appendix A</b> , <b>there is a commitment to</b>	<p>In general, we support MNAL’s approach to buffers as described here and in Appendix A, providing it applies to both wetlands and watercourses (as discussed under #3). As such, any buffers less than 30 m (but still greater than 15 m) around wetlands (and watercourses as discussed under #3) will be addressed in site-specific EISs during the site plan control stage and will include the following components that will be subject to municipal review and potential buffer adjustments:</p> <p>1) Rationalization on why a 30 m buffer cannot be achieved,</p>

HESL Peer Review Recommendation #	Updated Recommendation From HESL	MNAL Response	Additional Comments from HESL
		<p><b>ensure a variable width buffer width of a minimum 30 m average around every wetland within this property.</b> Variable width buffers are commonly employed throughout the Province.</p> <p><b>Appendix C</b> includes a figure providing clarity on the minimum buffers around each wetland and watercourse. Purple shaded areas are wetlands or riparian corridors with wetland attributes. The blue lines are the better-defined intermittent or permanent tributaries on the subject lands, including all having any potential as fish habitat. The pink line is the minimum 30 m buffer that we have recommended around Henry Marsh, with the green line being the minimum 15 m buffer limit we have recommended around the remainder of the wetland and watercourse features; all areas within these identified limits have been zoned Environmental Protection (EP). There will be very limited development within the protected EP zones, but this will include road segments, identified as 1 to 4 in the figure in <b>Appendix C</b>. A justification for each of these encroachments into the EP zones is also provided in <b>Appendix C</b>.</p>	<p>2) A demonstration that a minimum average 30 m buffer is still being provided around that specific wetland and watercourse as a whole, as part of a variable width buffer approach, and</p> <p>3) Discussion on how ecological functions of the wetland and watercourse will be retained with the final buffer dimension that is being provided.</p>
5	We recommend that the EIS be revised to read that all buffers will be zoned as Environmental Protection.	The proposed Zoning By-law amendment has incorporated minimum buffers within the EP Zone. The Site Plan Control process provides a mechanism to add to these minimum buffer dimensions and to ensure the long-term protection of all such additional buffers.	Resolved.
6	Original comment related to alternative routing of internal road within deciduous swamp, south of Precinct D, which has been done. Resolved.	No further response required.	
7	Please clarify the route of the road into Precinct D and explain why mapping shows it within the 15 m wetland buffer and outside the defined Precinct Development Area.	<b>Appendix C</b> includes an updated figure which provides clarity on the revised road at the entrance into Precinct D, showing it outside of the minimum 15 m buffer.	Resolved.
8	We recommend that the table summarizing field survey effort be included in an updated version of the EIS.	That information was included in the MNAL letter of May 28, 2019, which forms an addendum to the EIS and is part of the public record. As this document provides transparency around the peer review process that was completed, it is appropriate that it remains an addendum to the EIS, and that the original study not be updated. No further response is therefore required.	Resolved.
9	We recommend that additional surveys for amphibians be completed or a conservative approach be used which assumes the presence of Significant Wildlife Habitat and factors that presence into determination of buffer widths.	All wetlands providing amphibian habitat will be protected and buffered. As stated in our letter of May 28, 2019, a minimum buffer of 30 m is to be provided adjacent to Henry Marsh and an average buffer of minimum 30 m, but with some latitude for site-specific adjustment down to 15 m, will be provided adjacent to all other wetland features. The final buffer configurations and widths will need to be justified through the site-specific EIS to be prepared in support of each individual Site Plan Control application. The updated EIS recommendations included in <b>Appendix A</b> provide clarity on how buffers are to be addressed in those EIS reports. We believe this approach to be very conservative, and one which provides robust protection for all wetland functions, including amphibian breeding habitat. Possible impacts on amphibian breeding habitat will be considered in relation to any site-specific reductions of wetland buffers below 30 m. As such, we do not believe additional amphibian surveys are warranted at this time.	Resolved.
10	We recommend that an updated version of Figure 2, which labels survey locations, be included in an updated version of the EIS.	That information was included in the MNAL letter of May 28, 2019, which forms an addendum to the EIS and is part of the public record. Therefore, no further response is required.	Resolved.
11	Original comment requested explanation of why amphibian surveys	No further response required.	

Peer Review Response Table (Cont.d).

HESL Peer Review Recommendation #	Updated Recommendation From HESL	MNAL Response	Additional Comments from HESL
	were not completed in the eastern portion of the property, with response being that no habitat was present within that area. Resolved.		
12	We recommend that the results of the additional 2019 vernal pool surveys be included in an updated version of the EIS. Any vernal pools that are identified in these surveys as amphibian breeding habitat should be located outside the development footprint, with at least a 30 m buffer around them.	The results of the additional 2019 surveys of the vernal pools is provided in <b>Appendix D</b> . No amphibians were heard in these features in 2018. Despite the very wet spring conditions in 2019, none were large enough to qualify as Significant Wildlife Habitat for woodland amphibians. None of the vernal pools had egg masses or tadpoles in them in 2019.	Resolved.
13	Original comment requested additional information on breeding bird survey methodology and locations, which was provided. Resolved.	No further response required.	
14	We recommend that the results of the additional 2019 Common Nighthawk surveys be included in an updated version of the EIS.	Information on additional night-time surveys completed during 2019 for Common Nighthawk, as well as Whip-poor-will, are included in <b>Appendix E</b> . These were completed at both the eastern and western ends of the property. There were no recordings of either species during these surveys.	Resolved.
15	We recommend that the detailed methods and survey locations of deer wintering habitat be included in an updated version of the EIS.	The MNAL letter of May 28, 2019 serves as an addendum to the EIS and is part of the public record. Therefore no further response is required.	Resolved.
16	We recommend that the results of the deer wintering habitat surveys be included in an updated version of the EIS.	The MNAL letter of May 28, 2019 and the present correspondence form addendums to the EIS and are part of the public record. Note that information that is supplementary to this is included in <b>Appendix F</b> .	Resolved.
17	Please discuss the quality of the remaining MNR identified Stratum 2 deer wintering area that occurs outside the property and assess its condition in terms of cumulative effects that might exist, such as other development pressures, road fragmentation etc.	Supplementary information on the deer yard as a whole is provided in <b>Appendix F</b> . This demonstrates that there are substantial areas of good winter cover outside of the portion of this deer yard within the subject property, and that access to retained areas of good winter cover within the subject property will remain viable upon development. The Site Plan Control process provides an opportunity to confirm that access to retained areas of good winter cover within the property is being maintained. As such there are no warrants for additional winter deer surveys. The District of Muskoka confirmed in the meeting of May 17, 2019 that they do not ever request more than a single year of surveying for winter deer cover, notwithstanding MNR's advice in their "Deer Habitat Assessment 101", which is only a guidance document and has no official status in relation to the assessment of significant wildlife habitat.	Resolved.
18	We recommend that the commitment to obtain supplementary information on	The MNAL letter of May 28, 2019 forms an addendum to the EIS and is part of the public record. Therefore no further response is required.	Resolved.

Peer Review Response Table (Cont.d).

HESL Peer Review Recommendation #	Updated Recommendation From HESL	MNAL Response	Additional Comments from HESL
	aquatic habitat conditions at crossing locations as part of the Site Plan process be documented in the EIS.		
19	We recommend that the commitment to obtain supplementary information on rare vegetation as part of the Site Plan process be documented in the EIS.	The MNAL letter of May 28, 2019 forms an addendum to the EIS and is part of the public record. Therefore no further response is required.	Resolved.
20	We recommend that the commitment to undertake bat maternity habitat surveys within Precinct E, as part of the Site Plan process, be documented in the EIS.	The MNAL letter of May 28, 2019 forms an addendum to the EIS and is part of the public record. Therefore no further response is required.	Resolved.
21	We recommend that the locations and numbering of surveys for bat maternity habitat be included in an updated version of the EIS.	The MNAL letter of May 28, 2019 forms an addendum to the EIS and is part of the public record. Therefore no further response is required.	Resolved.
22	Please explain how criteria provided in <b>Table 8</b> of the EIS are used to rank the quality of snag trees within individual plots.	<p>As indicated in the EIS, the assessment is qualitative, but is dependent on the number of the criteria met within a certain plot, out of the ten criteria, generally as follows:</p> <p style="padding-left: 40px;">7 to 10 criteria met = high 4 to 6 criteria met = medium 1 to 3 criteria met = low</p> <p>This approach has been developed by MNAL, in conjunction with our sub-consultant Palmer, in order to provide a more standardized means of assessing the quality of woodlands, in the absence of any such standardized approach in the literature; it is an approach that our two firms have also employed on several other projects within the District of Muskoka.</p>	Resolved.
23	We recommend that the revised calculation on snag tree densities in <b>Table 9</b> be included in an updated version of the EIS.	An updated copy of <b>Table 9</b> is provided in <b>Appendix G</b> , and includes an updated snag density value in the final column, correcting for the mathematical error in MNRF's protocol.	Based on the corrected calculations, the estimated snag densities for Precincts A-D are an order of magnitude higher than originally calculated (i.e., 13.5-25.7 snags/ha vs. 1.3-3.8 snags/ha). Following MNRF guidance (i.e., 10 snags/ha represents high quality potential maternity roosting habitat), all of these precincts should therefore be considered high quality habitat. These increased snag densities should be incorporated into the calculation of the number of bat boxes required per precinct.
24	We recommend that further explanation of animal movement corridors be provided.	The MNAL letter of May 28, 2019, together with the present correspondence, form an addendum to the EIS and are part of the public record. Additional information on deer movement is included in <b>Appendix F</b> .	Resolved.
25	Please reword text to clarify that wetlands on the property have not been evaluated for provincial significance.	Per our comments in our response of May 28, 2019, the wetlands on and adjacent to the property have not been evaluated for provincial significance. These wetlands have not been evaluated by MNRF and therefore have no designation as locally or provincially significant. Wetland evaluations can't be done at a property	Resolved. Addendum #1 clarifies that the wetlands on and adjacent to the property have not been evaluated for provincial significance.

Peer Review Response Table (Cont.d).

HESL Peer Review Recommendation #	Updated Recommendation From HESL	MNAL Response	Additional Comments from HESL
		level, but must be done at a watershed level; in this jurisdiction, that is typically done by MNR. It is our opinion that the status of wetlands on the property is immaterial to this application as all wetlands are to be protected with robust buffers which are sufficient to maintain the functions of these wetlands and which are consistent with what would be required for a PSW. Buffer averaging, as is to be employed in the protection of wetlands on this property, is commonly employed in establishing buffer limits around Provincially Significant Wetlands. <b>Appendix B</b> includes a detailed justification of the proposed buffer widths.	
26	Original request was that further detail on mitigation measures associated with watercourse crossings be provided, including possible use of exclusion fencing. Such information was provided. Resolved.	No further response required.	
27	Original request was that language of recommendations be strengthened, which was done. Resolved.	No further response required.	
28	Please clarify <b>Figure 4</b> so that the ELC codes can easily be read and interpreted with a legend.	<b>Appendix H</b> includes an updated copy of Figure 4.	Resolved.
29	Original comment related to whether or not buffers were included in mapping of constraints; it was explained that minimum buffer requirements were included. Resolved.	No further response required.	
30	Please update EIS with the more recent references.	The MNAL letter of May 28, 2019 forms an addendum to the EIS and is part of the public record. Therefore no further response is required.	Resolved.
31	Original comments related to whether there was information on where wildlife had been observed on site in 1999; it was explained that such data was not available. Resolved.	No further response required.	
32	Please update the scientific names of warbler species. Please explain breeding codes.	<p>With respect to the scientific names of the warblers, this change was acknowledged in our earlier response of May 28, 2019. That document forms an addendum to the EIS and is part of the public record. Therefore no further response is required.</p> <p>With respect to the breeding evidence codes, these are as follows:</p> <ul style="list-style-type: none"> <li>x Observed. Species observed in its breeding season (no evidence of breeding). Presumed migrants should not be recorded.</li> <li>s Possible breeding. Singing male present, or breeding calls heard, in its breeding season in suitable nesting habitat.</li> </ul>	Resolved.

